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10 in her capacity as TDI Representative  
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12 UNITED STATES BANKRUPTCY COURT  
13 CENTRAL DISTRICT OF CALIFORNIA  
14 SANTA BARBARA DIVISION

15 MIDLAND PACIFIC BUILDING  
16 CORPORATION,

17 Plaintiff,

18 v.

19 JOHN E. KING, CAROLE D. KING, DOES  
20 1-25, inclusive,

21 Defendants.

22 DONNA CANGELOSI, in her capacity as  
23 TDI Representative,

24 Intervenor.

AP Case No. 12-01147

**INTERVENOR DONNA  
CANGELOSI'S NOTICE OF  
MOTION AND MOTION TO  
TRANSFER PROCEEDING TO THE  
DISTRICT COURT OF NEVADA**

1 TO: THE HONORABLE ROBIN L. RIBLET, UNITED STATES BANKRUPTCY  
2 JUDGE; PLAINTIFF MIDLAND BUILDING CORPORATION; DEFENDANTS JOHN  
3 E. KING AND CAROLE D. KING:

4 PLEASE TAKE NOTICE THAT Intervenor Donna Cangelosi, in her capacity as  
5 TDI Representative in the *In re Asset Resolution, LLC* bankruptcy proceeding (Case No.  
6 BK – S – 09-32824 RCJ (Nev.)), respectfully moves for entry of an order transferring this  
7 action from this court to the United States District Court, District of Nevada, where the *In*  
8 *re Asset Resolution, LLC* bankruptcy is pending before the Honorable Robert C. Jones,  
9 Chief Judge of the District Court of Nevada. The motion is made on the grounds—more  
10 fully explained in the accompanying brief—that this action involves title to property, the  
11 priority of liens on the property, and the value of property of the bankruptcy estate of Asset  
12 Resolution, LLC. The Nevada District Court has stated that the issue of title, lien priority  
13 and value of the property are a core element of its proceedings.

14 The motion is based upon this Notice of Motion and Motion, and the accompanying  
15 Memorandum of Points and Authorities and Request for Judicial Notice.

16 PLEASE TAKE FURTHER NOTICE that pursuant to Local Bankruptcy Rule  
17 (LBR) 9013-1(o)(1), motions of this type may be granted without a hearing unless one is  
18 specifically requested by filing and serving a written response that complies with Local  
19 Bankruptcy Rule 9013-1(a) (7) and request for hearing within 14 days of the date of service  
20 of this notice and motion.

21 PLEASE TAKE FURTHER NOTICE that pursuant to LBR 9013-1(a)(11), failure to  
22 file and serve a timely response may be deemed consent to the relief requested in the  
23 Motion to Transfer.

24 WHEREFORE, Intervenor Donna Cangelosi moves the Court to enter an Order  
25 transferring this case (AP Case No. 12-01147) to the United States District Court, District  
26 of Nevada, where the Asset Resolution, LLC bankruptcy is pending before the Honorable

1 Robert C. Jones, Chief Judge of the District Court of Nevada (Case No. BK-S-09-32824  
2 RCJ).

3 Dated: June 14, 2012

McGRANE LLP

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By: /s/ William McGrane  
William McGrane  
Attorneys for Intervenor Donna Cangelosi  
in her capacity as TDI Representative

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